

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

FOUR TIMES SQUARE
NEW YORK 10036-6522

TEL: (212) 735-3000

FAX: (212) 735-2000

www.skadden.com

DIRECT DIAL
212.735.7852
DIRECT FAX
917.777.7852
EMAIL ADDRESS
SCOTT.MUSOFF@SKADDEN.COM

FIRM/AFFILIATE OFFICES

BOSTON
CHICAGO
HOUSTON
LOS ANGELES
PALO ALTO
WASHINGTON, D.C.
WILMINGTON
BEIJING
BRUSSELS
FRANKFURT
HONG KONG
LONDON
MOSCOW
MUNICH
PARIS
SAO PAULO
SHANGHAI
SINGAPORE
STONEY
TOKYO
TORONTO
VIENNA

November 26, 2013

BY ECF AND HAND DELIVERY

The Honorable William H. Pauley, III
United States District Court Judge
for the Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/3/13

RE: *Pennsylvania Public School Employees' Retirement
System v. Bank of America Corp. et al.*,
11-CV-733-WHP (SDNY)

Dear Judge Pauley:

We write this letter motion on behalf of all parties to jointly move for an extension of the deadline for substantial completion of document discovery to January 31, 2014. The current deadline is November 29, 2013. No previous requests for an extension of this deadline have been made.

As discussed in the parties' Joint Status Report Concerning Class Certification and Document Discovery (attached hereto), filed October 31, 2013, the parties have been engaging in good-faith efforts to produce documents in response to the parties' respective discovery requests. To date, Defendants have produced approximately 4.5 million pages of documents and thousands of native files on the core issues in the litigation. Lead Plaintiff has produced hundreds of pages of documents in response to Defendant Bank of America's requests. Nonetheless, significant discovery remains to be completed, including, among other things, the collection and review of documents from more than 60 custodians whose electronically stored information Lead Plaintiff seeks pursuant to search protocols that contain more than 100 search terms.

The Honorable William H. Pauley, III
November 26, 2013
Page 2

As a result, the parties agree that, despite best efforts to date, the parties will be unable to complete document production by November 29, 2013. The parties therefore jointly move for an extension of the deadline for substantial completion of document production to January 31, 2014. Such an extension should not unduly prejudice any party and would not significantly impact the Court's management of its docket or require any change to the current deadline of December 31, 2014, for the completion of fact witness discovery.

Respectfully,



Scott D. Musoff

cc: All counsel (by email)

Application to extend the discovery
deadline granted. Parties shall substantially complete
document production by Jan. 31, 2014.

SO ORDERED:



12/3/13
WILLIAM H. PAULEY III U.S.D.J.